

April 12, 2016

EX PARTE NOTICE VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, GN Docket No. 12-268; *Comment Sought on Competitive Bidding Procedures for Broadcast Incentive Auction 1000, Including Auctions 1001 and 1002*, AU Docket No. 14-252

Dear Ms. Dortch:

On April 8, 2016, Chris Wieczorek and Mark Bishop of T-Mobile USA, Inc. (“T-Mobile”),¹ Trey Hanbury of Hogan Lovells US LLP, Davina Sashkin of Fletcher, Heald & Hildreth, counsel to T-Mobile, Keith Cendrick and Paul Walters of RIO Steel & Tower Ltd. (“RIO”), and Brian Grundy of Grundy Telcom Integration, Inc. (“Grundy”) met with Bill Lake, Barbara Kreisman, Hillary DeNigro, Blaise Scinto, Howard Symons, Gary Epstein, Pamela Gallant, Charles Meisch, Erin Griffith, Sasha Javid, Rudy Sultana, and Melissa Dunford of the Federal Communications Commission Incentive Auction Task Force.

The representatives from RIO and Grundy discussed their extensive experience and resources relevant for the upcoming repacking after the 600 MHz Incentive Auction. The parties also reviewed the attached slide presentation, which provides additional detail on the capabilities of RIO and Grundy to complete the work necessary for the repacking process.

Regarding timing, the representatives from the tower-climbing companies estimated that the average antenna installation project takes two to four weeks, though they emphasized that there is no typical installation. A low-elevation, side-mounted, high-frequency antenna installation could be done in as few as five days. An extremely complex, high-elevation, top-mounted, low-frequency antenna installation could take as long as six weeks or more, though the tower climbing experts characterized an installation of this complexity and length as an outlier.

RIO and Grundy said wind conditions are far more important than temperature to the safe and timely installation of equipment. While environmental concerns or other issues can slow or stop tower-climbing projects, RIO and Grundy described years of experience in agile workforce planning. The

¹ T-Mobile USA, Inc. is a wholly-owned subsidiary of T-Mobile US, Inc., a publicly traded company.

companies respond quickly when issues arise to move crews to other sites and ongoing projects while the delays are resolved. This flexibility extends to their ability to travel to different, far-flung sites involved in the repacking. These companies are more than prepared to travel wherever they are needed. Indeed, their business model depends on travel to wherever tower work is available and typically brings companies such as Grundy and RIO to work-site locations throughout North America. On the day of the presentation, for example, RIO had five tower projects ongoing in multiple states across the country.

During the meeting, the representatives from RIO and Grundy also explained to the task force that tower climbing companies possess or can quickly fabricate the necessary resources to complete the tower work involved in the repacking process. RIO operates its own full turnkey tower fabrication facility. This facility produces pole derricks called gin poles; complete tower structures, such as guyed towers up to 1,500 feet and self-support towers up to 450 feet; and the components necessary for tower modifications and strengthening. RIO can fabricate a gin pole in as little as two weeks once it has the design specifications. Grundy, meanwhile, said it has already started to invest in additional winches, poles and harnesses to support the expansion of work envisioned for the post-auction 600 MHz transition.

In addition to physical resources, RIO and Grundy have the personnel to complete the types of tower-climbing work necessary for the 600 MHz repacking process. The companies' representatives described a typical crew, which is comprised of a foreman on the ground, a "top-push" on the tower, and two to three additional crew members to support the work. The companies' representatives said they have a number of well-trained tower climbers already doing the antenna work that will be necessary for the repacking process and could subdivide crews further for greater capacity. Moreover, the companies' representatives explained their plans to hire additional experienced climbers as the post-auction relocation draws closer to implementation, and both RIO and Grundy expressed confidence in their ability to hire from the relatively large pool of experienced climbers who have taken on other work in reaction to the reduced demand for television broadcast work since the DTV transition. They also noted that while they expect to train additional climbers, no inexperienced "greenhand" would be permitted to do tower work without careful supervision from a more experienced foreman and top push.²

RIO and Grundy speculated on why their extensive experience, training, equipment and capabilities may have been underplayed in initial assessments of tower-climbing capacity available to support broadcast operations.³ Grundy said it routinely performs tall-tower, broadcast work, but speculated that its related work activities installing high-intensity lighting on smokestacks may have attracted more attention lately. As for RIO, the company has multiple, high-profile broadcast tower projects underway, but its representatives said they may receive more attention for their tower-fabrication capabilities than for their extensive tower-climbing work.

² RIO stated that the following ten certifications must be obtained as a Level One Tower Technician: RIO Safety Basic Training; Tower Safety Climbing Awareness; Fall Protection; Emergency Action Plan; Rigging Equipment Basics; Hoist Operation; RF Safety Awareness; First Aid; Forklift Operation; and Gin Pole Procedures.

³ See Letter from Myra Moore, President, Digital Tech Consulting, Inc. to Marlene H. Dortch, Secretary, FCC, GN Docket No. 12-268 (filed Nov. 6, 2015), *attaching* Digital Tech Consulting, Inc., *Broadcast Spectrum Repacking Timeline, Resource and Cost Analysis Study* (Oct. 2015).

Representatives of both companies stressed that safety is the utmost priority for all crew members of all experience levels at any tower site. At the meeting, representatives from RIO showcased the safety handbook and safety equipment used for its projects. The task force members reviewed a version of the RIO safety handbook, each of which is job-specific and reviewed daily by the crews on each tower site. The tower climbing experts also demonstrated safety equipment used in tower climbing for the task force members. This equipment included protective harnesses and shock-absorbing Y-lanyards, which is a type of harness designed to lessen the impact of a fall. The tower-climbing company representatives also discussed radiofrequency attenuation suits, which are made of polyester and steel fibers and protect tower climbers from radiation by attenuating radiofrequency by approximately 10 dB. The suits allow climbers to work on towers while nearby antennas (particularly FM radio antennas) are in operation in a manner that limits exposure to harmful radiofrequencies, which increases flexibility for the crews and can accelerate the pace of tower work.

Scheduling must account for site-specific conditions.⁴ While weather plays a role in planning, the tower-climbing experts said that they are able to safely climb towers and complete antenna installations in nearly any weather aside from excessive wind conditions or temporary storms. High heat and intense cold will not ordinarily stop an antenna-installation project. Grundy, for example, reported working in conditions with temperatures as low as -40 degrees Fahrenheit. According to Grundy, these conditions are most certainly not ideal and can slow down the pace of work, but representatives for both Grundy and RIO stressed their experience with completing time-sensitive work under harsh conditions: they dress for the weather and work through the conditions to get the job done.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, an electronic copy of this letter is being filed in the above-referenced dockets. Please direct any questions regarding this filing to me.

Respectfully submitted,

/s/ Trey Hanbury

Trey Hanbury

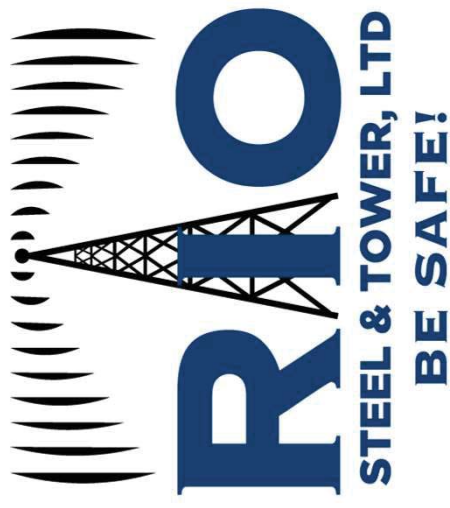
Partner
Counsel to T-Mobile USA, Inc.

Attachment

cc: Bill Lake
Barbara Kreisman
Hillary DeNigro
Blaise Scinto
Howard Symons
Gary Epstein

⁴ Multi-tenant sites, for example, will require coordination among broadcasters to minimize RF exposure for climbers. Similarly, broadcasters may want to avoid tower-climbing activity during certain broadcast programming windows, such as sweeps periods, if possible.

Pamela Gallant
Charles Meisch
Erin Griffith
Sasha Javid
Rudy Sultana
Melissa Dunford



RIO Steel & Tower has been providing service to the broadcast and telecom industries for over 10 years. Our range of services can provide you with what you need to get your project completed on time and within budget. From fabrication to close-out, we will be in your corner every step of the way.



GIN Pole Installation by RIO Steel & Tower



Everything is
bigger in
Texas



GIN Pole hoisted up the tower



GIN Pole installed



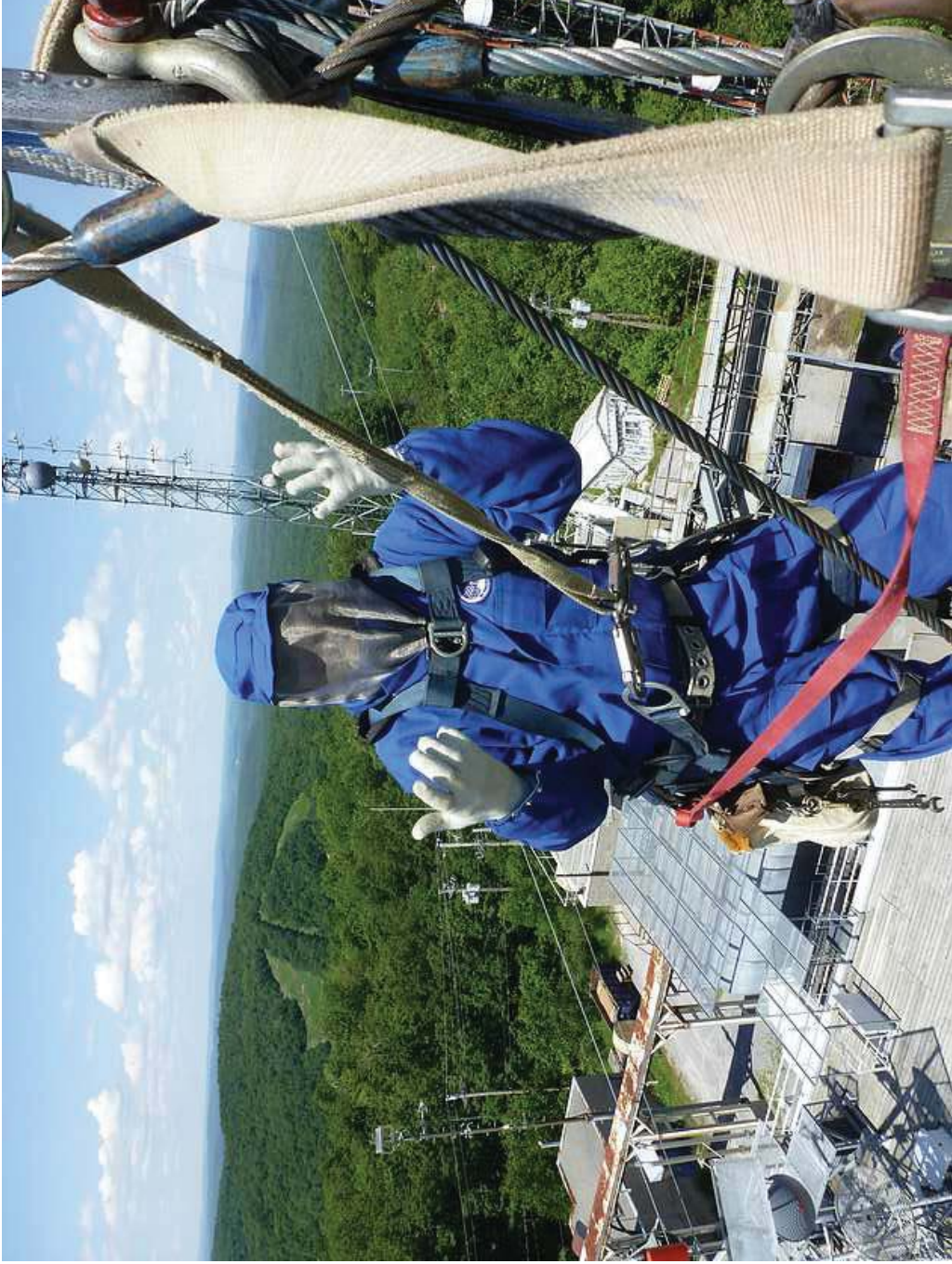
Grundy Telcom Integration Inc. provides engineering, manufacturing, and construction services, related to the installation and continued operation of broadcast transmitter facilities, towers, and antenna systems world wide.



Traveling
wave slot
install with
GIN pole



RF safety suits



A fine spring day
in Canada and
the Northern US

